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## Before the FEDERAL COMMUNICATIONS COMMISSION RECEIVED

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In the Matter of	)	FEDERAL COMMENTO
	)	FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECOND
Advanced Tolorision Crestoms	<u> </u>	OFFICE OF THE SECRETARY
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	Ś	
Service	,	
	)	

To: The Commission

#### PAXSON SUPPLEMENT TO PETITION FOR RECONSIDERATION

Paxson Communications Corporation, through its licensee subsidiaries ("PCC"), by its attorneys, and pursuant to the Commission's Order, 1/2 hereby supplements its June 13, 1997 Petition for Reconsideration ("Petition") of the Sixth Report and Order in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("Sixth R&O"), insofar as requesting adjustments to the DTV Table of Allotments. In the Petition, PCC stated its belief that, by allowing interested parties a brief additional comment period to provide a more thorough analysis, the Commission could more efficiently and expeditiously fix discrete problems in the DTV Table of Allotments than by reviewing a plethora of separate rulemaking petitions and notification applications after the DTV Table became final. PCC appreciates this opportunity offered by the Commission, and, accordingly, PCC is providing herewith supplemental information regarding certain stations and their respective DTV allotments.

List A B C D F

<sup>1/</sup> Advanced Television Systems, Order, MM Docket No. 87-268, DA 97-1377 (rel. July 2, 1997). No. or Copies rec'd O+

#### I. OUT-OF-CORE DTV ALLOTMENTS

Stations WAQF-TV (Batavia, NY), <sup>2</sup> KAJW-TV (Tolleson, AZ) <sup>3</sup> and WAKC-TV (Akron, OH) have been assigned DTV channels that are presently outside of the Commission's "core spectrum." Consequently, PCC anticipates that it will be forced to relocate its digital operations for these stations at the end of the DTV transition period and to incur the costs associated with such a move. Two stations, WAQF-TV and KAJW-TV, have current NTSC operations on Channel 51, and, because the core spectrum may eventually be located between channels 2-46, face the possibility that neither of their existing allotments will be in the Commission's core spectrum.

Because the Commission did not put into effect regulations that would mitigate the costs of these single and double moves, PCC has examined the possibility for immediately relocating to an available allotment in the core spectrum. Unfortunately, PCC was unable to identify any such vacant allotments that would satisfy the Commission's criteria of "no new interference." Consequently, PCC urges the Commission to make efforts to alleviate the costs incurred by the few stations facing these circumstances or modify the Commission's criteria concerning such relocation. The disparity in treatment of similarly situated

<sup>2/</sup> PCC is the assignee of this station (Fant Broadcasting Companies is the licensee and assignor). Because the assignment application has been granted, and because assignor did not submit a petition for reconsideration of the *DTV Orders*, PCC asserts standing to raise concerns regarding this station.

<sup>3/</sup> PCC holds a 49% interest in America 51, L.P., the permittee of this station. Because of this substantial interest, and because America 51, L.P. did not submit a petition for reconsideration of the *DTV Orders*, PCC asserts standing to raise concerns regarding this station.

<sup>4/</sup> See Sixth R&O at  $\P 222$ .

broadcasters, where some broadcasters must pay to relocate their digital operations but others enjoy allotments in the core spectrum, runs afoul of *Melody Music*<sup>5/</sup> and its progeny.

#### II. KTFH-TV — Conroe, TX

In the *Sixth R&O*, the Commission proposed to allocate Channel 5 (presently slated to be outside of the Commission's "core spectrum,") as KTFH-TV's paired DTV channel with an ERP at the very minimum 1 kW. KTFH-TV broadcasts on NTSC Channel 49, PCC is understandably concerned that, while the 1 kW ERP is predicted to fully replicate KTFH-TV's service area, in practice, transmissions at such low powers will be unable to propagate through structures of any moderate size. Accordingly, PCC requests that the Commission reassign KTFH-TV's DTV channel or, in the alternative, authorize increased ERP and antenna height for KTFH-TV.

As shown in the attached Engineering Statement ("Exhibit E"), Channels 25 and 16 are feasible substitutes for KTFH-TV's paired allotment. The percent match for replication of the KTFH-TV NTSC operation on Channel 49 on either DTV Channel 25 or DTV Channel 16 is identical to the DTV Channel 5 allotment. Neither of the proposed alternate DTV channels would have an effect on the percent match for NTSC replication with respect to all affected DTV allotments or cause additional interference to NTSC operations. In fact, operation on either of the alternate channels rather than DTV Channel 5 would reduce predicted interference to NTSC operation on Channel 5 at San Antonio, Texas. As between the alternate channels, DTV Channel 25 is the preferred choice due to the possibility of

<sup>5/</sup> Melody Music, Inc. v. FCC, 345 F.2d 730 (D.C. Cir. 1965).

as shown in the attached Engineering Statement, PCC requests that the Commission reassign KTFH-TV Channel 25 as its DTV allotment. In the event Channel 25 proves to be unavailable, Channel 16 should be reassigned as the DTV allotment for KTFH-TV.

In the alternative, PCC requests that the Commission allow for increased power and antenna height for the station. Not only will this change help mitigate the inequitable circumstances of KTFH-TV's allotment, but it will act to remedy the egregious power disparity existing between certain UHF stations. As the Commission is well aware, many DTV stations with UHF allotments, including KTFH-TV, have been allotted power levels at a mere fraction of the power levels of other DTV stations. The practical effect of this power disparity, as fully described in the Petition, of is that many viewers will be unable to receive the lower power stations with their set-top antennas, though they will easily obtain reception of the higher power DTV stations. This disparity of power has to be considered in the context of the Commission's replication policy, the purpose of which was to assure that viewers who currently watch a particular station would receive its digital broadcasts. Unfortunately, the DTV Table undercuts that aspiration. Replication's purpose can still be achieved, however, without the construction of thirty-foot antennas for every home. The Commission can authorize increases in antenna power and height in meritorious instances such as with KTFH-TV. As a result, KTFH-TV would be relieved of a serious competitive disadvantage and viewers watching new DTV technology would enjoy all of their stations without constructing pole antennas.

<sup>6/</sup> See Petition at 3-12.

For the reasons stated in the foregoing, and as demonstrated in the attached Engineering Statement, PCC requests that the Commission act on these requests.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION

John R. Feore, Jr. Thomas J. Hutton

Scott S. Patrick

Its Attorneys

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Dated: August 22, 1997

#### **EXHIBIT E**

# ENGINEERING STATEMENT SUPPLYING SUPPLEMENTAL INFORMATION IN SUPPORT OF A PETITION FOR RECONSIDERATION OF THE SIXTH REPORT AND ORDER IN DOCKET 87-268 BY PAXSON COMMUNICATIONS CORPORATION

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# EXHIBIT E ENGINEERING STATEMENT SUPPLYING SUPPLEMENTAL INFORMATION IN SUPPORT OF A PETITION FOR RECONSIDERATION OF THE SIXTH REPORT AND ORDER IN DOCKET 87-268 BY PAXSON COMMUNICATIONS CORPORATION

#### INTRODUCTION

This statement was prepared on behalf of Paxson Communications Corporation, through its licensee subsidiaries ("PCC") relative to the above referenced FCC Docket and in support of its June 13, 1997 Petition for Reconsideration in the matter. PCC is the FCC licensee of station KTFH-TV Channel 49 at Conroe, Texas. This statement provides information regarding the anticipated propagation and future operation of KTFH on the FCC DTV allocated Channel 5 and suggested reallocation channels.

#### KTFH-TV PROPOSED REALLOCATION

KTFH-TV has been assigned television Channel 5 for use as a DTV channel. In the previous June 13 petition, PCC stated its concerns regarding the potential poor performance of Channel 5 with limited ERP and its position outside of the core of DTV channels. At that time FCC OET Bulletin No. 69 was not yet available, making a substitute channel allotment suggestion impossible.

Because technical information relating to PCC's petition is now available in OET Bulletin No. 69, adopted July 2, 1997 by Commission Order (DA No. 97-1377), this statement supplies supplemental information pertaining to PCC's request for reconsideration of the DTV allotments for KTFH-TV. Specifically, it supports a reallocation to DTV operation on Channel 25 or 16.

94%

#### **TECHNICAL ANALYSIS**

The software program needed to verify the PCC proposal to change the DTV channel assignments of KTFH-TV is now available through the release of OET Bulletin No. 69. The office of the undersigned has the complete software package as described in OET Bulletin No. 69 available for use on a computer work station similar to the computers used by OET in the development of the DTV allotment plan. The results of individual market analysis have been compared with service replication and interference evaluations contained in Table 1 of Appendix B of the Sixth Report and Order with total agreement and verification of the accuracy of the program.

#### Analysis for KTFH-TV

On behalf of PCC, the Office of Lohnes and Culver has conducted an analysis using the software developed by OET to demonstrate that, as an alternative to the FCC DTV Channel 5 allotment, DTV Channel 25 or 16 can be paired with NTSC Channel 49 at Conroe, TX. Attached to this statement as Figure 1 is a computer printout showing an analysis of the allotment of DTV Channel 5 proposed by the Commission in the Sixth Report, as compared with an analysis of the alternative DTV channel allotments proposed by PCC. The analysis indicates that the percent match for replication of the licensed NTSC Channel 49 operation of KTFH-TV for the proposed allotment of DTV Channel 5 is identical with either of the alternative DTV Channel allotments.

A study of other NTSC operations and proposed DTV allotments was conducted to determine the impact on those operations/allotments as a result of the proposed change in the Conroe, TX allotment. The result of that analysis is tabulated on Figure 2. The analysis indicates that the proposed DTV Channel 25 or 16 allotment will have no effect on the percent match for ATV/NTSC replication with respect to all affected DTV allotments and will not cause additional interference to NTSC operations. The predicted interference to the NTSC operation on Channel 5 at San Antonio, TX will be reduced by the proposed KTFH-TV change away from DTV Channel 5 at Conroe, TX.

#### CONCLUSION

The analysis for KTFH-TV described above, based on the use of the Commission's computer software, demonstrates that there are no DTV allotments or NTSC operations that would be adversely affected by changing the DTV channel allotment for KTFH-TV to DTV Channel 25 or 16. PCC's proposal to pair an alternative DTV Channel with KTFH-TV is justifiable since the FCC allotment on DTV Channel 5 is not within the tentative DTV core of channels specified in the Sixth Report and Order. PCC requests that Channel 25 be considered its primary reallocation channel to minimize the conflict with land mobile communication in the lower UHF channels. PCC further requests that the Commission reconsider its treatment of the paired DTV allotment for KTFH-TV by evaluating service replication based on a non-directional antenna pattern since that will maximize service area and the impact on other U.S. DTV allotments and NTSC operations may be minimal.

Respectfully submitted, LOHNES AND CULVER

By, Robert D. Culver, P.E. Maryland Reg.No. 19672

August, 1997

## FIGURE 1A COMPARISON OF DTV PAIRINGS KTFH-TV WITH FCC DTV CH. 5 KTFH-TV WITH SUBSTITUTE DTV CH. 16

#### SIXTH REPORT AND ORDER

 num atv:
 3342

 num ntsc:
 3342

 cell:
 4.0186

 Analysis of:
 49N TX

Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
lost to all IX	1069407	2045.5
alicia of SA TY CONPOR		

Analysis of: 5A TX CONROE

HAAT 359.0 m, ATV ERP 1.0 kW, direction 190.0 degrees T, F/B = 13.9 dB

POPULATION AREA (sq km)

within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
percent match ATV/NTSC	100.0	100.0

#### PROPOSED SUBSTITUTION

num atv: 3342 num ntsc: 3342 cell: 4.0186

Analysis of: 49N TX CONROE

	POPULATION	AREA (sq km)
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
løst to NTSC IX	1069348	2033.4
lost to additional IX by ATV	59	12.1
løst to all IX	1069407	2045.5

Analysis of: 16A TX CONROE

HAAT 359.0 m, ATV ERP 70.2 kW, direction 190.0 degrees T, F/B = 18.8 dB
POPULATION AREA (sa km)

	LOLOMALTON	with lad vi
within Noise Limited Contour	3335657	15463.5
not affected by terrain losses	3335657	15463.5
lost to NTSC IX	2767	4.0
lbst to additional IX by ATV	0	0.0
lbst to ATV IX only	0	0.0
lbst to all IX	2767	4.0
percent match ATV/NTSC	100.0	100.0

#### Prepared by

Lohnes and Culver Washington, D.C.

August, 1997

## FIGURE 1B COMPARISON OF DTV PAIRINGS KTFH-TV WITH FCC DTV CH. 5 KTFH-TV WITH SUBSTITUTE DTV CH. 25

#### SIXTH REPORT AND ORDER

num atv: 3342 3342 num ntsc: cell: 4.0186 Analysis of: 49N TX CONROE POPULATION AREA (sq km) within Noise Limited Contour 3335657 15463.5 ndt affected by terrain losses 3335657 15463.5 ldst to NTSC IX 1069348 2033.4 lost to additional IX by ATV 59 12.1 lost to all IX 1069407 2045.5 Analysis of: 5A TX CONROE HAAT 359.0 m, ATV ERP 1.0 kW, direction 190.0 degrees T, F/B = 13.9 dB AREA (sq km) POPULATION within Noise Limited Contour 3335657 15463.5 not affected by terrain losses 3335657 15463.5 lost to NTSC IX 0 0.0 lost to additional IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to all IX 0 0.0

#### PROPOSED SUBSTITUTION

100.0

100.0

num atv: 3342 num ntsc: 3342 cell: 4.0186 Analysis of: 49N TX CONROE

percent match ATV/NTSC

POPULATION AREA (sq km) within Noise Limited Contour 3335657 15463.5 not affected by terrain losses 3335657 15463.5 lost to NTSC IX 1069348 2033.4 lost to additional IX by ATV 59 12.1 lost to all IX 1069407 2045.5 Analysis of: 25A TX CONROE

HAAT 359.0 m, ATV ERP 86.7 kW, direction 190.0 degrees T, F/B = 18.8 dB
POPULATION AREA (sq km)

AREA (sq km) within Noise Limited Contour 3335657 15463.5 not affected by terrain losses 3335657 15463.5 lost to NTSC IX 3 4.0 lost to additional IX by ATV 0 0.0 lost to ATV IX only 3 4.0 lost to all IX 3 4.0 percent match ATV/NTSC 100.0

Lohnes and Culver Washington, D.C. August, 1997

### FIGURE 2A ANALYSIS OF NTSC/ATV STATIONS AFFECTED BY CHANNEL 16 DTV PAIRING FOR KTFH-TV

#### KTFH PAIRED WITH CH. 5 (SIXTH R&O) KTFH PAIRED WITH CH. 16 (PROP.)

ium atv:   10684		num atv: 10684		
ium ntsc: 10690		num ntec: 10690		
tell: 4.0351		cell: 4.0351		
malyeis of: IN LA ALEXANDRIA	•	Analysis of: SN LA ALEXANDRIA		
POPU	LATION - AREA (sq km)		POPULATION	AREA (ac kin)
within Noise Limited Contour 100	74324 44463.0	within Noice Limited Contour	1004324	44483.0
not affected by terrain leaven 9	98277 43704.3	within Noise Limited Contour not affected by terrain losses	998277	43704.3
loot to NTSC IX	16500 569.0	lost to NTSC 1X	16508	569.0
lost to additional 1x by ATV	0 0.0	lost to additional IX by ATV		
lost to all IX	1.6508 569.0 0 0.0 1.6508 569.0	lost to additional IX by ATV lost to all IX	16508	0.0 569.0
malyais of: 35A LA ALEXANDRIA		Analysis of: 35A LA ALEXANDRIA		
HAAT 485.0 m, ATV ERF 1000.0 kW, Co	T 200 0.0 db 2.2 (DA ya	BAAT 405.0 m, ATV HRP 1000.0 K	W, Cap Ad)	2.2 dB 90.0 deq
	ATION AREA (sq km)			AREA (ng kin)
within Noise Limited Contour 100	04324 44483.0	within Noise Limited Contour	1004324	44483.0
nut affected by terrain losses 100	30586 44103.7	not affected by terrain losses	1000586	11103.7
lost to NTSC IX	D 0.0	iost to NTSC IX	٥	0.0
lost to additional IX by ATV	655 169.5	lost to additional IX by ATV	655	169.5
lost to ATV IX only	655 169.5	lost to ATV 1X only	655	169.5
lost to all IX	655 169.5	lost to all IX	655	169.5
not affected by terrain losses 100 lost to NTSC IX lost to additional IX by ATV lost to ATV IX only lost to all IX percent match ATV/NTSC I	.00.0 99.9	percent march ATV/NTEC	100.0	99.9
num atv: 7063		num atv: 7063		
1 2 2		num ntsc: 7063		
num ntsc: 7063 :ell: 4.0190		cell: 4.0190		
analymin of the TX BEAUMONT		Analygin of: ON TX BEAUMONT		
	LATION AREA (ng km)		POPULATION	AREA (eg kin)
within Noise Limited Contour 70		within Noige Limited Contour	704455	33285.1
not affected by terrain losses 70	33695 33100.3	not offeeted by terrain losses		33100.3
lost to NTCC IX	3684 4714 3	lost to NTSC IX		4714.3
lost to additional TY by ATV	0 00	loot to additional IX by ATV	03004	0.0
lost to NTSC IX lost to additional IX by ATV lost to all IX	3684 4714 3	lost to all IX	63684	4714.3
Malvela of: 31A TX BEAUMONT	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Analynia of: 21A TX BEAUMONT	0,2004	311413
HAAT 393.0 m, ATV ERP 1000.0 kW, Co	m Add 1.6 da	MAAT 293.0 m, ATV ERP 1000.0 kg	W Can Add	1 6 48
	LATION AREA (sq km)		POPULATION	λREA (cq km)
within Nuise Limited Contour 70	04455 33285.1	within Noice Limited Contour	701155	33285.1
not affected by terrain losses 70	14249 33184.7	not affected by terrain losees	204240	72104 7
lost to NTSC IX	121 64.3	lost to NTSC IX	701219 121	64.3
lost to additional TV by ATU	7 - 1 -			<b>-</b>
	o <b>0</b> .0	lost to additional IX by ATV	J1	0.0
lost to ATV IX only	0 0.0 7 8.0	lost to Additional IX by ATV lost to ATV IX only	7	0.0 8.0
not affected by terrain losses 70 lost to NTSC IX lost to additional IX by ATV lost to ATV IX only lost to all IX percent match ATV/NTSC I	0 0.0 7 8.0 121 64.3	lost to NTSC IX lost to additional IX by ATV lost to ATV IX only lost to ATV IX percent match ATV/NTSC	7 121	0.0 8.0 64.3

Prepared by
Lohnes and Culver Washington, D.C.
August, 1997

93%

#### FIGURE 2A (CONTINUED)

within Noise Limited Contour 4418651 45297.3  Not attected by terrain longes 4411022 45537.8  lost to NTSC IX 0 0.0  lost to additional IX by ATV n 0.0  lost to ATV IX only 0 0.0  lost to all IX 0 0.0  percent match ATV/NTSC 100.0 100.0	PUPULATION AREA (sq km)  within Noise familiad Contour 4418651 46282.3 not affected by terrain losses 4411022 45537.8 lost to NTSC IX lost to additional IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to all IX 0 0.0 perdent match ATV/NTSC 1.00.0 100.0
Num alv:   6976   9027   4.0004	#Ithin Noise Limited Contour 1.663667 40635.9 not effected by thereain losses 1646977 39239.8 lost to NTSC IX 39595 452.0 lost to additional TX by NTV 13 8.0 lost to ATV IX only 37917 412.8 lost to all IX 39608 460.0 percent match ATV/NTSC 99.3 99.4
num ntsc: 1018 cell: 3.9990 Analysis of: 15N TX COLLEGE STATION  within Noise Limited Contour 137301 4071.0 not affected by termain losses 137301 4071.0 lost to NTSC IX lost to additional IX by ATV 0 0.0 lost to all IX Auslysis of: 12A TX COLLEGE STATION	num ntsc: 1018 num ntsc: 1018 cell: 3.9990 Analysis of: 15N TX COLLEGE STATION  within Noise Limited Contour 137391 4071.0 not affected by terrain losses 137391 4071.0 lost to NTSC IX lost to additional IX by ATV 0 0.0 lost to all IX Analysis of: 12A TX COLLEGE STATION

#### FIGURE 2A (CONTINUED)

num atv: 10750 num ntsc cel: 3.9884 Analysis of: 11N TX-HOUSTON  within Noise Limited Contour 3901485 44614.2 not affected by terrain located 3898739 44083.7 lost to additional IX by ATV 0 0.0 lost to adl IX 19517 1208.5 Analysis of: 31A TX HOUSTON HANT 570.0 m, ATV ERP 751.7 kW  within Noise Limited Contour 3901485 44580.3 lost to NTSC IX 0.0 not affected by terrain losses 3901150 44580.3 lost to NTSC IX 0.0 lost to additional IX by ATV 28 12.0 lost to all IX 28 12.0 percent match ATV/NTSC 100.0	Num atv: 10750   Num ntec: 11N TX HOUSTON   Num nterior 11N TX HOUSTON   Num nterior 1208   Num nterior 1208
within Noise Limited Contour 446867 15085.2 not affected by terrain losses 146067 15085.2 lost to NTSC IX 0 0.0 lost to additional IX by ATV 0 0.0 lost to additional IX by ATV 0 0.0	Dum atv: 3767  num ntro: 3767  cell: 4.0046  Analysis of: 16N TX CORPUS CHRISTI  within Noise Limited Contour 446867 15085.2  lost to NTSC IX 0 0.0  lost to additional IX by ATV 0 0.0  Analysis of: 22A TX CORPUS CHRISTI  BAAT 296.0 m, ATV EMP 50.0 kW, direction 342.0 degroes 1  POPULATION AREA (ag km)  within Noise Limited Contour 446867 15085.2  lost to ATV EMP 50.0 kW, direction 342.0 degroes 1  POPULATION AREA (ag km)  within Noise Limited Contour 446867 15085.2  lost to ATV IX only 0 0.0  lost to ATV IX only 0 0.0  lost to ATV IX only 0 0.0  porcent match ATV/NTSC 100.0
Num alv:   6343   6343   6343   6343   6343   6343   651   4.0389   651   14N TX HOUSTON	man vis. o m. Alv Ekr 205.2 km, direction 50.0 degrees 1

#### **FIGURE 2A (CONTINUED)**

	€					
num arv:	6904~			num aliv: 6904		
num nicee	6904			num ntsc: 6904		
cell:	4.0358			cell: 4.0358		
yualaare	OE: 20N TX HOUSTON	DODGE BETON	ADEA (or km)	Analysis of: 20N TX HOUSTON	DODGE ATTOM	ADEA (no km)
ui shi s	Noise Limited Contour	3797966	27903.7	within Noise Limited Coutour	3787966	27903.7
not at	found by terrain losses	3787631	27867.4	not affected by termain losses	3787631	27867.4
lost	o NTSC IX	73	4.0	lost to NTSC IX	73	4.0
Tool t	o additional IX by ATV	3603	201.8	lost to additional IX by ATV	3603	201.8
lost	(v sl) IX	3676	205.8	lost to all IX	3676	205.8
Analysis	SEC O M APV TRP 228.8	W direction	30 0 degrees T	Analysis of: 20N TX HOUSTON  within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to will IX Analysis of: 19N TX HOUSTON HAAT 552.0 m, ATV ERP 228.8	kW direction	30.0 degraca :
15551	502.(1 m) 1610 ERI = 22010	PUPULATION	AREA (ng km)	12917 33610 111, 211 1111	POPULATION	AREA (BG km)
فندال فاب	Noise Limited Contour	3787966	7 27903.7	within Noise Limited Contour	3787966	27903.7
اان د ها	lected by terrain losses	3787774	27091.6	not affected by terrain losses	3787774	27891.6
lost	O NTSC 1X	0	0.0	lost to additional IV by ATU	0	0.0
lost	o A'IV IX only	ò	0.0	lost to ATV IX only	0	0.0
lost	o all IX	ō	0.0	lost to all IX	0	0.0
percei	r march ATV/NTGC	100.0	100.0	MAAT 552.0 m, ATV ERP 228.8  within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to ATV IX only lost to all IX percent match ATV/NTSC	1.00.0	100.0
				チャー・キャルキオートによるだちにおいばいはいければ日本のみつでする	*****	-443222222222
į						
num atv:				num atv: 4958 num nusc: 4958		
num ntsc	4.0117			cel): 4.0117		
		POPULATION	AREA (ad km)		MOTARTERON	AREA (ng km)
within	Noise Limited Contour	505965	1,9890.0	within Noise Limited Contour	585965	19890.0
logr	O NTEC IX	0	0.0	logs to MTGC IX	0	0.0
lost	o additional IX by ATV	ō	0.0	look to additional 1% by ATV	ŏ	0.0
lost	o all IX	0	0.0	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost, to additional 1X by ATV lost to all IX analysis of: 16h LA LAFAYETTE	Ö	0.0
yusjaeja	of: 16A LA LAPAYETTE	la atroprion	740 () doggeograph (T	Analysis of: 16A LA LAFAYETTE	leter and was and an	340 0 3000000
WAT	360.0 m, ATV ERP 89.1	POPULATION	AREA (sc km)	HAAT 360.0 m, ATV ERF 89.1	POPHLATION	AREA (ca km)
willii	Noise Limited Contour	585965	19890.0	within Noise Limited Contour	505965	19890.0
not a	focted by terrain locces	585965	19890.0	not affected by terrain losses	585965	19890.0
lost b	O NTSC IX	0	0.0	lost to NTSC IX	Ç	0.0
lost	o ATV IX only	n n	6.0	lout to ATV IX only	ñ	0.0
lost	o all IX	o o	0.0	lost to all IX	ő	ŏ.ŏ
perce	it match ATV/NTSC	100.0	100.0	within Noise Limited Contour not affacted by terrain losses lost to NTSC IX Sout to additional IX by ATV test to ATV IX only lost to all IX percent match ATV/NTSC	200.0	100.0
1						
num ntec:	7700			num atv: 7709 rum atac: 7709 cell: 3.9954		
	3.9954			cell: 1.9954		
Munlyeis	of: 22N TX GALVESTON			Analysis of: 22N TX GALVESTON		
		POPULATION	AREA (89 km)		POPULATION	AREA (pg km)
within	Noise Limited Contour	3696126	30800.6	within Noise Limited Contour	3696126	30800.6
leat I	o MICC IX	2030170	0.0	lost to MTCC TY	U 40779	0.0
lost	o additional IX by ATV	ñ	0.0	look to additional IX by ATV	å	0.0
lost	o_all_IX_	٥	0.0	within Noise Limited Contour not offected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to all IX Analysis of: 23A TX GALVESTON HAAT 566.0 m, ATV ERF 236.0	0	0.0
Analysis	of. 23A TX GALVESTON	uni Alamania	350 0 A **	Analysis of: 23A TX GALVESTON	ina ada i	350 0 do
HAAT	366.0 m, ATV ERP 236.0	RW, GILECTION	AREA (on km)	MAAT 966.0 m, ATV ERP 236.0 )	CM, GIFCGGROUS	APEN (ag km)
within	Noise Limited Contour	3696126	30800.6	within Noise Limited Contour	3696126	30800.6
not af	lected by terrain losses	3696126	30800.6	not offected by terrain losses	3696126	30800.6
lost t	o NTSC IX	0	o.o	lost to NTSC IX	0	0.0
lost	o additional IX by ATV	U	0.0	lout to additional IX by ATV	Ď	0.0
1086 6	o win ix outh	U O	υ.υ n.n	lost to all IX	0	0.U 8 n
percen	r match ATV/NTSC	100.0	100.0	Analysis of: 23A TK GALVESTON HAAT 566.0 m, ATV ERF 236.0 )  within Noise Limited Contour not offected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to additional IX only lost to all IX percent match ATV/NTSC	100.0	100.0
				· · · · · · · · · · · · · · · · · · ·		

#### FIGURE 2B **ANALYSIS OF NTSCIATV STATIONS** AFFECTED BY CHANNEL 25 DTV PAIRING FOR KTFH-TV

KTFH PAIRED WITH CH. 5 (SIXTH R&O) KTFH PAIRED WITH CH. 25 (PROP.)

MALYSES DEFORE MOVING KIFH TO CHANNE), 25	ANALYSES AFTER MOVING KIFH TO CHANNEL 25
Analysis pf: 5N LA ALEXANDRIA	Analysis of: 5N LA ALEXANDRIA
POPULATION AREA (og km)	POPULATION AREA (EQ km)
within Noise Limited Contour 1004324 44400.0 not offected by terrain losses 990277 43704.3 hear to NTSC IX 16508 569.0 lost to additional IX by ATV 0 0.0 lost to all IX 16508 569.0 Analysis of 35A LA ALEXANDRIA	within Noise Limited Contour 1004324 44483.0
not affected by terrain losses 998277 43704.3	not affected by terrain losses 990277 43704.3
1000 TO NTSC TX 10508 569.0	Tost to MISC IX 1650B 503.0
lost to additional IX by ATV 0 0.0	lose to additional IX by ATV 0 0.0
108t bp all 1X 16508 569.0	lost to all 1X 16508 569.0
Analysic of, 35A LA ALEXANDRIA	Analysis of: 35A LA ALEXANDRIA
HAAT 485.0 m, ATV BRP 1000.0 kW, Cap Adj 2.2 dB 90.0 dag T	HAAT 485.0 m, ATV ERP 1000.0 kW, Cap Adj 2.2 dB 90.0 deg
POPULATION AREA (ng km)	POPULATION AREA (aq km)
within Noise Limited Contour 1004324 44483.0	within Noise Limited Contour 1004324 44483.0
not affected by terrain loboco 1000586 44103.7	not affected by terrain losses 1000506 44103.7
tost to NISC IX 0 0.0	LOST TO NISC IX
lost to additional IX by ATV 655 169.5	lost to additional lx by ATV GDS 169.8
Lost to ATV 1X only 655 169.5	lost to ATV IX only 655 169.5
lost to all IX 655 169.5	lost to all IX 655 169.5
### POPULATION AREA (nq km)  within Noise Limited Contour 1004324 44483.0  not affected by terrain looses 100586 44103.7  lost to NTSC IX 0 0 0.0  lost to additional IX by ATV 655 169.5  lost to ATV IX only 655 169.5  lost to all IX 655 169.5  percent match ATV/NTSC 100.0 99.9	percent match ATV/NTSC 100.0 99.9
Analysis of: 6N 7X REAUMONT	Analysis of: 6N TX BENUMONT
DANKE BUT ON A DOS AND LOND	ANALYSIS OF: BUTA BENOMON!
within Noise Limited Contract 197456 2225 1	within Noise 1 inited Contour Thats 33385
and affected by retrain logger 703695 33100 3	mod affarmation terrain Joseph 707595 33100 3
lost to NTSC IX	logs to NTSC IV 63684 A714 2
loss to additional ly by ATV	Tame to Mills 14 by STU 0 0 0
lose thall TX	lost to all IV
Analysis of 21 h TV sawaimon's	And the data in the Deviller
Analysis of: 6N TX RRAUMONT  within Noise Limited Contour 704455 32285.1  not affected by terrain longer 734695 33100.1  lost to NTSC IX 64684 4714.3  long to additional IX by ATV 0 0.0  lest to all IX 63684 4714.3  Analysis of: 21A TX BEAUMONT NAME OF Additional 1.6 de POPULATION AREA (45 km)	HART 293 O B BTU ERP 1000 0 low Com Add 1.6 dB
POPULATION AREA (no km)	POPULATION AREA (ng km)
within Noine Limited Contour 204455 33205 1	within Noise Limited Contour 704455 33285 1
not affected by terrain logger 204349 33104 7	act of feel ad by revisin logged 704249 33384 7
LOST TO NTSC IY	North NATEC IV
lone to additional 18 by May	lock to additional TV by ATV
logg re May IV only	loss to Amil IV and
lost the All 18 and	lock to MV IN only
1000 tp 411 /A / 1700 100 0	lost to all in 1774 to 2774 to
POPULATION   NRA (nq km)   Name   N	percent match Arvaise 100.0 100.0
- 4	
Analysis bi: 5N TX FORT WORTH	Analymin of: 5N 6% FORT WORTH
DODAY ATTOM ADDA ( 1-)	INDEED A COLUMN A DECEMBER A COLUMN A C
within Noise Limited Contour 4418681 46297,3	within Noise Limited Contour 4418651 46297.3
within Noise Limited Contour 4418651 46297.3  not affected by terrain loopes 4400524 45050.5  lost to NTSC IX 173366 5449.6  lost to additional IX by ATV 0 0.0  lost to all IX 173366 5449.6  Analysis of: 41A TX FORT WORTH	not affected by terrain losses 4400524 45059.5
lost to NTSC IX 173366 5449.6	lost to NTSC IX 373346 5449.6
lost the additional IX by ATV 0 0.0	lost to additional 1X by ATV 0 0.0
lone to all TX 173366 5440.0	lock to all IX 173366 5449.6
Analysis of: 41A TX FORT WORTH	Analysis of: 41A TX FORT WORTH
within Noise Limited Contour 4418651 AREA (Eq.km) within Noise Limited Contour 4418651 45527.8 lost to NTSC IX 0 0.0 lost to NTSC IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to all IX 0 0.0 percent match ATV/NTSC 100.0 100.0	TOPULATION AREA (og km)
within Noise Dimited Contour 4418651 46297.3	within Noise Limited Contour 441,8651 46297.3
not especified by terrain losses 4411022 45537.8	not affected by terrain losses 4411022 45537.8
tose to MISC IX 0 0.0	lost to MISC IX 0 0.0
iner the additional IX by ATV 0 0.0	fort to additional IX by ATV 0 0.0
iner to ATV IX only 0 0.0	lont to ATV IX only 0 0.0
lost to all IX 0.0	lost to all IX 0 0.0
percent match ATV/NTSC 100.0 100.0	persons match ATV/NTEC 100.0 100.0

Prepared by Washington, D.C. Lohnes and Culver August, 1997

#### **FIGURE 2B (CONTINUED)**

A STATE OF THE CONTRACTOR	Analysis of: SN TX SAN ANTONIO
Analysis of: 5N TX SAN ANTONIO	
POPULATION AREA (sq km)	POPULATION AREA (sq km)
within Noice Limited Contour 1663667 40635.9 not affected by terrain logger 1638940 39003.6 lost to NTSC IX 51375 2892.3 lost to additional IX by ATV 36 4.0 lost to all IX 51411 2896.3 Analysis of: 55A TX EAN ANTONIO	within Noise Dimited Contour 1693667 40639.9
not affected by terrain loanen 1630940 39003.6	not directed by terrain losses 103340 39003.6
lost to NTSC IX 53375 2892.3	1086 to NISC 1X 513/5 2892.3
Inst to additional IX by ATV 36 4.0	iont to additional ix by Aiv 0.0
lost to all IX 51411 2896.3	lost to all IX 51375 2092.3
Analysis of: 55A TX EAN ANTONIO	Analysis of: 158 TX SAN ANTONIO
HAAT   424.0 m, ATV ERP 1000.0 RW, Cap Adj 3.3 db	MAAT 124.0 m, ATV ERP 1000.0 kw, day, Adj 315 dB
POPULATION AREA (eq kin)	POPULATION AREA (ag km)
within Noise Limited Contour 1663667 10635.9	within Naine Limited Contour 1663667 40635.9
not affected by terrain losses 1646977 39233.0	not affected by terrain londer 164697/ 19239.8
lost to NTSC 1X 39595 452.0	lost to NTSC IX 39525 452.0
lost to additional IX by ATV 13 8.0	lost to additional IX by ATV 13 8.0
lost to ATV IX only 37917 412.0	lost to MTV IX only 37917 412.0
lost to all IX 39608 460.0	lost to all IX 39608 160.6
Notice Limited Contour   1663667   40635.9	percent match ATV/NTSC 99.3 . 99.4
Analysis of: 25N LA ALEXANDRIA	Analysis of: 25N LA ALEXANDRIA
POPULATION AREA (ng kin)	POPILIATION ARRA (sq km)
within Noise Limited Contour 31,7703 1,9607.1	within Noise Limited Contour 317703 19607.1
not affected by terrain loopen 317534 19575.0	not affected by terrain loomen 317534 19575.0
Tout to NIEC IX 208 48.2	10st to NTUC 1X 200 40.2
Within Noise Limited Contour   33,7703   19607.1	lone to additional IX by ATV 0 0.0
108t to all 1X 208 48.2	1081 to all IX 209 48.2
Analyzin of: 26A th ADEXANDRIA	Analygin of: 254 LA SLEXANURIA
HART 415.0 m, ATV HRP 64.6 kW, direction 190.0 degrees T	HAAT 415.0 m, ATV ERP 64.0 kW, direction 190.0 degrees 1
POPULATION AREA (89 KM)	POPULATION AREA (aq km)
within horse Limited Concour 317702 19607.1	within noise Limited Contain 31703 19607.1
noe affected by terrain losabe 31705 19603.1	not allegged by certain losses 31/695 19603.1
108E ED NISC IX	1000 CO RISC IX
lose to additional in by Aiv	tobe to additional IX by AIV
Toda to Alv IX only	Table to MV IX BNIY
lost to all IX	lost to all IX
### ##################################	percent match ATV/NTSC 100.0 100.0
	***************************************
Analysis of: 22N TX CALVESTON	Analysis of: 22N TX CALVESTON
TRATILLATION AREA (or len)	PODII NUTON DONE (no len)
within Noise Limited Contour 1000126 30000 (of key	within Noige Limited Contour 360116 30000 (80)
within Noise Limited Contour 3696126 30000.6 not affected by terrain lesses 3696126 30000.6 lost to NTSC JX 0 0.0 lost to additional IX by ATV 0 0.0 lost to all JX 0 0.0 Analysic of 23A TX GALVESTON	not afformed by formain logger 3646226 10800 6
last to NTSC IV	Tory to Misc IV
lost to additional IX by ATV	lost to additional by by ATV 0 0 0 0
log to all IV	Touch brown II TY
Analypic of: 23A TX GALVESTON	Analysis of 23A TX GALVESTON
HAAT 566.0 m, ATV ERP 236.0 kW, direction 350.0 degrees T	· · · · · · · · · · · · · · · · · · ·
DODINATION APER (am bm)	DODITATION AREA (or let)
within Noise Limited Contour 3696126 3000 6	within Noise Limited Contour 3696126 3000 6
not affected by terrain loanes 3696126 30000 6	not affected by terrain loages 1696126 10000 6
lost to NTSC IX	
	lost to NTSC IX
logt to additional TY by ATV 0 0 0 0	lost to NTSC IX  0 0.0
lost to additional IX by ATV 0 0.0	lost to NTSC IX  Lost to additional IX by ATV  0 0.0  Lost to Additional IX by ATV
lost to additional IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to ATV IX only 0 0.0	lost to NTSC IX  lost to additional IX by ATV 0 0.0  lost to ATV IX only 0 0.0
lost to additional IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to all IX 0 0.0 lost to all IX 0 0.0	within Noise Limited Contour 3696126 30000.6 not affected by terrain losses 3696126 30000.6 lost to NTSC IX 0 0.0 lost to additional IX by ATV 0 0.0 lost to ATV IX only 0 0.0 lost to ATV IX only 0 0.0 percent match ATV/NTSC 100.0 100.0

#### FIGURE 2B (CONTINUED)

	1					
Analusis	of: 26N TX HOUSTON			Analymin of: 36N TX ROUGTON		
•	İ	POPULATION	APEA (sq km)	-	PODITI ATTOM	AREA (sq km)
witchi	a Maine Limited Contour	3825068	11379.9	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to all IX	3825058	31770 0
not a	Fforted by torrain leasen	3924678	11119.5	not affected by terrain losses	3824678	31339 5
1000	NTCC TY	8750	336 2	lost to MTSC 1X	A750	778 7
1050	en additional TV by ATU	2246	141 3	lost to additional IX by ATV	2345	341 3
1000	to addictonal in by hiv	1100	370 6	lost to all IV	2343	141.5
1080	LAS. OUR DIV BOSSONS	71032	379.0	TOSE CO ATT IN	11099	3/3.6
MICOL I	334.0 111, 220.0	CONTRACTION	30.0 Octg2003 (	10000 554.4 41, 200 140 22,010 4	UNIONI NETON	(my be) ABSIA
	Malus Links & Combaux	29112000	25330 0	within Noise limited Contour	3035050	men (ad xm)
W1 C111	ffeeted by taxvala lourse	3034046	21267 2	nor affected by reversin losses	3023000	31367 7
loor a	tracted by testain 1000ed	3524040	31397.7	look to MTCC IV	2024040	313117.7
1080	to Mist in	0	0.0	look to additional TV by Ami	0	0.0
1080	to additional ix by hiv	ý	0.0	lost to additional in by Miv	0	0.17
lost.	to all the		6.0	lear to all 1V	Ů	0.0
1000	The manufacture of the Control of th	100 0	100.0	TOBL CO ALL IX	100 0	100.0
Bercel	match Alvynist	100.0	100.0	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lout to additional IX by ATV lest to ATV IX only lost to all IX percent match ATV/NTSC	100.0	100.0
Bankada	of: 39N TX HOUSTON			Analysis of: 39N TX HOUSTON		
Misilante	THE STATE OF THE PROPERTY.	DODLIT NO ON	Auch Ing leni	Minity 219 OL: 13N IN HOUSTON	DODLIT BATTON	ADEA (no be)
and what a	Notes Limited Content	227041100	27743 E	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to all IX Analynin of: 38A TX HOUSTON	2777777	AND COLUMN
W1. U 21 3.1	feated by tarrin leans	3773022	27/42.5	water in Notice Limited Contour	3773066	27743.5
1000	- NOCC TY	3770032	1/0	lock at which it	3773674	2.055.1
lost: 1	a addicional TV by ATV	2200	169.5	lost to additional TY by MAN	204	109.5
lost	to all TV	2000	173 6	lost to all 17	2000	1723 6
Auglusta Auglusta	of the tructon	2330	172.6	Annionia of the Anty Moderna	2370	173.6
1/11/1	594 0 m NTV PRU 199 5	w direction	70 0 degrees T	HAAT 594.0 m, ATV ERP 199.5 k	W discount as	70 0 degrees a
	)	INTELLIBRATION	APPA (20 km)	110A1 377.0 m/ A17 0Kt 277.3 K	POPULATION	AREA (wg km)
within	Noise Limited Contour	7779622	27743.5	within Noisa Limited Contour	1279622	27743 5
nor at	feeted by terrain lonner	3779574	27731.4	not affected by terrain losses	3772574	27711 4
loct t	O NTSC IX	0	0.0	Lout to NTSC IX	0	0.0
logr	o additional IX by ATV	186	A î	last to additional IX by ATV	186	e 7
1085	O ATV IX OTLY	186	F 1	lost to ATV IX only	186	2.1
lost	o all ix	186	ñî	logg to all IX	186	£ 1
nercat	ht match brokerror	100.0	100 0	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to ATV IX only lost to all IX percent match ATV/NTSC	100	100.0
percoi		100.0	100.0	percent match Artynise	100.0	100.0
etti den ajuli ini	e प्राप्त के के के प्रोप्त के का का का का का का का आपना है। <b>10 14 15 14 1</b> 5 14 15 14 15 15 14 15 15 14 15 15 14 15	4H		44.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4	*	
Analyzin	of: ASN TX VICTORIA			Auslynia of: 25N TX VICTORIA		
• 1		POPULATION	AREA (ser km)		POPULATION	AREA (ng km)
within	Noise Limited Contour	164600	16144.5	within Noice Limited Contour	164600	16144.5
not a	feated by terrain losses	164600	10144.5	within Noise Limited Contour not affected by terrain losses lest to NTSC IX lest to additional IX by ATV lost to add IX Analysis of: 15A IX VICTORIA	164600	16144.5
lost (	O NTSC IX	254	60.3	lost to NTSC IX	254	60.3
lost	o additional IX by ATV	0	0.0	lost to additional 1X by ATV	0	0.0
lost	o all IX	254	6U.3	lout to all TX	254	60.3
Analysia	of: 15A TX VICTORIA			Analycia of: 15A TX VICTORIA		
TAAII	DITION WY WAY INC. FOLD !	(W, direction	270.0 denrees T	HAAT 311.0 m, ATV BRU 50.0 kg	W. direction	270.0 degrees 1
withir	Noise Limited Contour	164600	16144.5	within Noise Limited Contour	164600	16144.5
not at	fected by terrain losses	164600	16144.5	within Noise Limited Contour not affected by terrain losses lont to NTSC IX lost to additional IX by ATV lost to ATV IX only lest to all IX percent match ATV/NTSC	164600	16144.5
lost t	O NTSC IX	0	0.0	lont to NTSC 1X	٥	0.0
lost t	to additional IX by ATV	0	0.0	lost to additional IX by ATV	o.	0.0
lost	o ATU IX only	0	0.0	lost to ATV IX only	٥	0.0
lost	o all IX	U	0.0	lost to all IX	Ó	0.0
percer	it match ATV/NTSC	100.0	100.0	percent match ATV/NTSC	100.0	100.0

#### FIGURE 2B (CONTINUED)

Analysis of: 25N TX MACO  within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV lost to all IX Analysis of: 26A TX WACO HAAT 558.0 m, ATV ERP 224.6 i  within Noise Limited Contour noil affected by terrain losses lost to NTSC IX lost to additional IX by ATV	120776 120776 kw, direction FOPULATION 718975 718564 114 38	29295.0 29154.2 52.3 20.2	within Noise Limited Contour not affected by terrain losses lost to NTSC IX lost to additional IX by ATV	718975 715405 120776 0 120776 kw. direction POPULATION 718975	29295 0 29154 2 52.3 28.2 44.2
lost to ATSC IX lost to additional IX by ATV lost to ATV IX only lost to all IX	114		lost to additional IX by ATV lost to ATV IX only lost to all IX percent match ATV/NTSC		